

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
ALAN TAVERAS,

Plaintiff,

Case No.: 20 Civ. 1200 (KPF)

-against-

**NOTICE OF CROSS-MOTION  
FOR SUMMARY JUDGMENT**

NEW YORK CITY, New York,  
KEECHANT SEWELL, in her Official  
Capacity as NYPD Police Commissioner,

Defendants.

-----X

PLEASE TAKE NOTICE, that upon the Declaration of Alan Taveras dated January 12, 2023 with annexed exhibits, Declaration of Amy L. Bellantoni dated January 13, 2023, Statement of Undisputed Material Facts pursuant to Local Rule 56.1, Memorandum of Law in Support, and upon all prior pleadings and proceedings had herein, Plaintiff Alan Taveras will move this Court before the Honorable Katherine Polk Failla at the United States Courthouse located at 500 Pearl Street, New York, New York on a date set by this Court for an Order of Judgment as a matter of law pursuant to Federal Rule 56 in favor of Plaintiff on his claims for violations of his rights as codified by the Second and Fourteenth Amendments to the United States Constitution, together with all such other and further relief as the Court deems just and proper, including without limitation, declaratory relief, permanent injunctive relief, compensatory monetary damages in at least a nominal amount, reasonable statutory attorney's fees, permanent injunctive relief, costs and

disbursements, and such further, different, and alternative relief as the Court deems just and proper.

Pursuant to Local Rule 6.1, opposition papers, if any, are required to be served on or before January 27, 2023; reply papers, if any are required to be served on or before February 3, 2023.

Dated: January 13, 2023  
Scarsdale, New York

THE BELLANTONI LAW FIRM, PLLC  
*Attorneys for Plaintiff*

\_\_\_\_\_/s/\_\_\_\_\_  
Amy L. Bellantoni (AB3061)  
2 Overhill Road, Suite 400  
Scarsdale, New York 10583  
abell@bellantoni-law.com